

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
Case No. 5:23-CV-5-FL**

THE COMMON APPLICATION, INC.

*Plaintiff,*

v.

BONCK AMERICA CORPORATION, f/k/a  
BEIJING BONCK TECHNOLOGY  
AMERICA CORPORATION,

*Defendant.*

**CONSENT ORDER FOR PERMANENT  
INJUNCTION AND FINAL JUDGMENT**

This matter comes before the Court on the parties' joint motion for entry of a consent order for permanent injunction and final judgment. Plaintiff The Common Application, Inc. ("Common App") filed its Complaint against Defendant Bonck America Corporation, f/k/a Beijing Bonck Technology America Corporation ("Bonck"), seeking injunctive relief pursuant to 15 U.S.C. § 1114, 15 U.S.C. § 1125(a), 15 U.S.C. § 1125(d), North Carolina common law claims, and N.C. Gen. Stat. § 75-1.1. Upon agreement of the parties, the Court hereby enters this Consent Order for Permanent Injunction and Final Judgment ("Order") as follows:

**STIPULATIONS**

1. The Court has jurisdiction over this matter and the parties.
2. The Complaint alleges that Bonck has been infringing on Plaintiff's trademark rights to "COMMON APP" and "COMMON APPLICATION" (the "Common App Marks") in violation of 15 U.S.C. § 1114, 15 U.S.C. § 1125(a), 15 U.S.C. § 1125(d), N.C. Gen. Stat. § 75-1.1, and common law.

## DEFINITIONS

3. As used herein, “Bonck” refers to Bonck America Corporation, f/k/a Beijing Bonck Technology America Corporation, its parents, subsidiaries, successors, assigns, and any other entity that Bonck controls.

## ORDER

4. Bonck shall immediately and permanently cease all use of the Common App Marks, including as trademarks, trade names, and/or domain names, and whether used alone or together with additional wording.

5. In the event Bonck violates the terms of this Order, Bonck shall pay two thousand dollars (\$2,000) to Common App each day that such violation continues.

6. The Court retains jurisdiction to enforce the terms of this injunction order.

7. All remaining aspects of this case are dismissed with prejudice, with each party to bear its own costs.

SO ORDERED, this the 29th day of June, 2023.



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Louise Wood Flanagan  
United States District Judge

**WE CONSENT:**

THE COMMON APPLICATION, INC.



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(Via Notices of Special Appearance)*



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